

Pharmaceutical Take-Back Program Guide

INTRODUCTION

This model is provided to you as a resource and toolkit for planning a one-day pharmaceutical take-back event in your local community.

This model includes information on:

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What is a Pharmaceutical Take-back event?

Pharmaceutical take-back programs have been emerging throughout the nation in response to the rising consequences of excess medications in our households. Whether over-the-counter or prescription, controlled or non-controlled, expired or unused, excess medications create a variety of problems in our communities, such as contamination of the water systems and the potential for accidental overdose and abuse.

Pharmaceutical take-back events vary in size and frequency in response to the local needs and resources. But their overall objectives remain the same, to provide a place for the public to dispose of un-wanted “drugs” in order to reduce the quantity entering the environment and reduce the amount of drugs available for diversion, abuse, or accidental poisoning. They are daylong events held at community venues where individuals can anonymously drop off their unwanted medications to be properly disposed of.

Why start a program in your area?

Pharmaceutical drugs have been a rising concern over the past years, especially with our adolescent populations. In 2008, the total sales for prescription drugs reached \$291.5 billion, a 1.4 percent increase from the previous year.¹ Adolescents are using prescription drugs as a new avenue to get “high”. Having an accumulation of medications in your household can also lead to confusion and misuse, causing accidental poisonings and even death.

“Nearly seven million Americans are abusing prescription drugs—more than the number who are abusing cocaine, heroin, hallucinogens, ecstasy, and inhalants, combined. That 7 million was just 3.8 million in 2000, an 80 percent increase in just six years. Nearly 1 in 10 high school seniors admits to abusing prescription painkillers. Approximately 40 percent of teens and an almost equal number of their parents falsely believe abusing prescription painkillers is safer than abusing “street” drugs.”²

¹ 1 Ruiz, Rebecca. “America’s Most Medicated States.” Forbes.com 31, August, 2009
<http://www.forbes.com/2009/08/17/most-medicated-states-lifestyle-health-prescription-drugs.html>

² 2 Drug Enforcement Administration. 2009. “Prescription Drug Abuse—A DEA Focus.” Online at

There are also environmental benefits to holding an event in your area. Less drugs down the drain equal less drugs in our water systems. In the past, the public has been instructed to flush their pharmaceutical drugs down the toilet for disposal, but recent studies have shown that medications are getting into the water supply, and our drinking water. Flushing drugs down the drain also cause problems with fish and wildlife that live in the water. As our environment and the green revolution become more important, we need to focus on the proper disposal of our medications.

Each collection event provides an anonymous outlet to turn in unused prescriptions. Publicizing these events to your community presents education and awareness of the dangers of prescription drug abuse and proper disposal options. All it takes is a few minutes to rummage through your old medications and throw all of the expired and unused medications into a bag and drop it off at a local pharmaceutical take-back location.

IDENTIFYING THE TEAM:

Local Police Department

Law enforcement presence is necessary at your event in case people bring controlled substances for disposal. A controlled substance is legally defined as *“a drug which has been declared by federal or state law to be illegal for sale or use, but may be dispensed under a physician's prescription.”* The federal controlled substance list contains all illegal drugs such as marijuana, ecstasy, methamphetamines; but, it also lists some well known prescription drugs such as OxyContin, Vicodin, Adderol, and Ritalin.

During your take-back event, controlled substances should be returned in the presence of a law enforcement official. Controlled substances usually make up about 10-15% of the medications returned at a typical take-back event. A take-back program which did not have law enforcement present would not be allowed to accept any controlled substance (such as OxyContin, Vicodin, Adderol, Ritalin etc...), many of which are high on the pharmaceutical abused substance list. Please refer to [The Idaho Controlled Substances Act](#) for a complete list of controlled substances in the state of Idaho.

Because of the law enforcement presence constraint, it is more feasible to plan a one-day event, lasting 3-5 hours than a longer event. This way you can ensure law enforcement presence throughout your event, as well as accept all medications for disposal. See page 10 for the list of substances not accepted for disposal. If you are interested in establishing a permanent take-back drop off location at a police station, refer to page 13, Police Station Permanent Drop-off Bins.

Set up law enforcement presence FIRST! Without their presence you cannot hold the event. When approaching law enforcement for help, it is best to have a few options in terms of event dates, as they may decline certain days. Local law enforcement are generally very willing to help. Your efforts help remove harmful and potentially dangerous medication from the streets and keep them out of our water systems.

Law Enforcement Responsibilities: (preferably 2-3 officials)

- In agreement that they are responsible for the controlled substances
- Provide security throughout event
- It is essential that law enforcement be in position to have visual contact with the individuals dropping off the medications

- The controlled substance must stay in sole physical possession of law enforcement throughout collection until in storage and then disposal
- Transport the bins to the agencies evidence storage locker or other secure location until ready for disposal.

Idaho State Police

Idaho State Police (ISP) will assist with the final transportation of the pharmaceuticals to their destruction. Local law enforcement are able to work with Regional ISP and can determine if they are able to organize the ISP transportation to the out-of-state incineration facility for final disposal.

In terms of medication transportation and disposal, ISP would like to know what is contained in each box to be destroyed. This means that at some point during the process, the medications should be inventoried and catalogued. Please discuss this matter with the local law enforcement officials; they are knowledgeable about the specific information ISP needs, and should take care of this process for you.

DEA Approval

After you have organized an agreement with local law enforcement, it is asked that you register your event with the DEA. Either the person in charge of the event or the local law enforcement should complete and send in the form (linked below). If you are not law enforcement, you must provide evidence of an agreement with law enforcement stating their presence at the event as well as their responsibility of the controlled substances. This form is intended to notify the DEA of your planned event as well as keep record of the take-back events in Idaho. You can access the form here: [Take Back Approval Form](#)

You may contact Idaho DEA for questions or concerns:
Charles Wahl, 208-334-1620 or Charles.l.wahl@usdoj.gov

Send Take-Back approval form to:
Drug Enforcement Agency
Attn: Charles Wahl
607 North 8th Street, Suite 400
Boise, ID 83702-5518

Pharmacist (optional)

You may want to have 1-2 pharmacists available in order to identify and catalogue the returned medications. It is optional, but it does provide useful information for your program. This wastage data can also prove valuable to physicians in better management of their prescribing practices. Contact local pharmacies to see if a trained pharmacist would be willing to donate a few hours over a weekend for a good cause. In addition, pharmacy students may be willing to volunteer.

It's not necessary to catalogue the drugs with a pharmacist, the pharmacist cataloguing data would only be for research purposes; the overall point is just to get the drugs off the streets and disposed of. It may be more time consuming and costly for you to hire a pharmacist to catalogue the collections.

Potential Sources of pharmacists

- Retail pharmacies

- Board of Pharmacies
- College of Idaho School of Pharmacy
- Hospitals

Pharmacist Responsibilities:

- It is recommended they wear a pharmacist jacket in order to make it obvious they are a pharmacist
- Gloves should be worn at all times, may even consider wearing a mask
- Pharmacist should provide the tools for counting medications
- Pharmacist should provide reference materials for identifying unknown medications
- For inventory: Identify the medications name, dosage, and amount of material to be recorded
- Pharmacist can answer questions from the public on medications
- They may inventory all medications received or they may only inventory controlled substances
- If it is a controlled substance, law enforcement should be alerted, and it should be handed over to law enforcement immediately following inventory
- The pharmacist should sign the inventory report at the end of the event, as well as keep a copy for their records.

Data Entry (optional)

If you are to inventory your collection event, it's recommended that you also have a data entry person. They will enter the inventory into a computer. The inventory data sheet should be printed out at the end of the event to ensure accuracy. It should be signed and verified by the pharmacist and law enforcement.

There are a variety of ways to inventory based on the type of information you want to gather from the event. At the very least you should inventory the controlled substances.

Site Supervisor

It is helpful to designate a site supervisor or overall manager to the event. Most likely this will be you! They should be involved in the entire planning process so as to direct volunteers and answer any questions that arise. Onsite, the supervisor should be in charge of all supplies, equipment and set-up. They should instruct the staff about responsibilities and procedures as well as make sure all regulations are being followed.

Supervisor Responsibilities:

- Secure site location
- Provide adequate signage
- Answer questions
- Keep data (lbs collected) for after-event publicity
- Be the liaison to police and other involved organizations
- Organize pre-event meeting to distribute information (optional)

Volunteers

It is recommended to gather at least 4-5 volunteers for the day of the event. You will need people to greet individuals, direct traffic, answer questions, and make sure people do not return medical waste and other non-accepted items. Contact local stakeholders for volunteers:

- High Schools and Universities for student volunteers (many schools require each student to complete a certain number of community service volunteer hours)
- Clean and safe community organizations
- Local government
- Rotary clubs
- Drug prevention organizations
- Local clinics or pharmacies
- Parent organizations (such as PTA or School Boards)
- Churches
- Retail Businesses

If volunteers will be used during a collection event, it is important to educate them about the federal and state regulations. Make sure they know not to personally accept the medications and are informed that the law enforcement officials should handle the returns. You may want to hold an informal informational session before the event. It is best to assign each volunteer a role for the day-of such as: greeter, surveyor, one whom makes sure they don't have any medical waste, or business waste, provide information etc. . . . Depending on the size of the event, you may need to have more than one person in each role. Be sure to thank your volunteers, have food and snacks available for them the day of, as well as provide breaks or shifts as to not wear out their enthusiasm.

What is a controlled substance?

The [DEA's list of controlled substances](#), which is very similar to Idaho's list of controlled substances (linked on page 2), is detailed through this link and encompasses about 15-20% of all prescriptions. Due to their abuse potential, controlled medications are regulated by the U.S. Drug Enforcement Administration (DEA), which enforces the Controlled Substances Act. These substances are drugs, or other substances, included in Schedule I, II, III, IV, or V of Title 21 (National Archives and Records Administration 2004). The Code of Federal Regulations (CFR) Sections 1308.11 to 1308.15 break the schedules down based on their abuse potential, utility of medical treatment, and safety when used under medical supervision:

- Schedule I, the most restrictive level, includes drugs or other substances with a high potential for abuse, no currently accepted medical use in the United States, and a low level of safety. Drugs and other substances in Schedule I are not approved for use, distribution, manufacture, or importation. Examples include heroin, marijuana, phencyclidine (PCP), and lysergic acid diethylamide (LSD).
- Schedule II drugs have high abuse potential but have currently accepted medical use in treatment, with severe restrictions. Examples include cocaine, methamphetamine, amphetamines (e.g., dextroamphetamine, Adderall®), morphine, oxycodone (e.g., OxyContin®), and methylphenidate (e.g., Ritalin®).
- Schedule III drugs have abuse potential less than that of Schedule I or II drugs and have currently accepted medical uses in treatment. Some drugs in this category include hydrocodone (e.g., Vicodin®) and butalbital (e.g., Fiorinal®).

- Schedule IV drugs have lower abuse potential than those in Schedule III and currently have accepted medical uses in treatment. These include alprazolam (Xanax®), diazepam (Valium®), and propoxyphene (e.g., Darvon®).
- Schedule V drugs have low abuse potential and recognized medical uses. Examples include cough medicines with codeine (e.g., Robitussin AC®).

The goal of the Controlled Substances Act is to ensure a closed distribution system - - a controlled substance is under the legal control of a person registered, or specifically exempted by the DEA - - until it reaches the ultimate user or is destroyed.

EVENT PLANNING

Date, Time, Location

A collection event should be held on a specific day for a specific amount of hours. It is best to limit it to 5 hours over a weekend due to the requirements of active law enforcement. The location should be convenient and easy if people are going to take their own time to collect their medications and drive them to your event. Proper signage and traffic flow should also be taken into consideration. You may want to configure a drive-through drop-off area so the participants don't have to get out of their cars.

Security should be taken very seriously as these returns are highly valuable to prescription drug abusers. Make sure that you can set up in a safe configuration in which no one can sneak up from behind. Law enforcement must also be able to see the collection and movement of the medications from the public to the workstation.

If you have decided to inventory the collections, you will need to have an electricity source for computer plug-in. This will call for an extra long extension cord with access to an outdoor electric socket or an indoor facility.

Some events have had success in joining with local health fairs, Household Hazardous Waste (HHW)/environmental/recycling fair, senior event which may already have a location and date set up. Do some research on local groups and Hazardous Waste Facilities; it may save you time and money in the end.

Some location ideas:

- Senior/community center
- Community area at police or fire station
- Mall
- Wal-Mart or local shopping center

The local need will dictate how often you should hold a take-back event. If you are receiving more than you can handle, you may want to consider partnering with the police department to set a permanent bin at their location.

Funding

You should do your best to get as much help and supplies donated, but some funding will be necessary. Contact local environmental programs, community upkeep programs, drug coalitions, school drug awareness groups, parents, volunteers etc.. to donate money or time. Most of the cost will end up being your time and publicity/advertising.

Creative funding examples:

- Plan the event with a health fair, senior fair, recycling event, that way you can split the costs.
- Use waste-disposal fees to cover the cost of medication and sharps/needle take-back and disposal program
- Contact with local environmental groups and agencies for funding
- Apply for state and federal grants
- Sell goods at the event

Advertising

Be sure to give yourself at least 2 weeks to get the word out. Use all of the local resources that you can as well as be creative:

1. Local newspapers and press releases
2. Radio Ads
3. Traffic signs/announcements
4. TV Public Service Announcements (PSA's)
5. Flyers/Bulletins at local pharmacies
 - a. See if the pharmacy will hand out flyers with prescriptions
 - b. Place stickers on all of the distributed prescription bags
6. School Newsletters to parents
7. Senior Citizen events
8. Direct mailing
9. Send flyers home to parents through school newsletters or report cards
10. Send flyers through household water bills
11. Website development, creating your own or post on existing community websites
12. Toll free regional info number

Take some time to think about your target population and then gear your advertising in accordance. Past surveys and data have shown that the senior female population is the most responsive, but it may vary in your area. Budgeting will vary greatly depending on the population in your area.

Critical Information to Advertise:

Where, when, hours of operation, who to contact for info.

Medications need to stay in original containers

Personal information may be crossed out but keep information about medications legible

Do not remove labels

NO thermometers

NO Sharps/Needles

NO medical waste

Household Waste ONLY

Medication will be taken to be destroyed properly

Advertising is also available on the national level, through nation-wide pharmaceutical educational campaigns. Check out these resources online, some even provide free advertising and educational materials on the dangers of pharmaceutical abuse.

- [Lock Your Meds, National Family Partnership](#)
- [SMARxT Disposal, A Prescription for a Healthy Planet](#)
- [The American Medicine Chest Challenge](#)
- [P2D2 Prescription Pill and Drug Disposal Program](#)
- [Office of National Drug Control Policy](#)

SUPPLIES

Take-Back Bins:

The deposit bins will be provided by the law enforcement.

Other Supplies

- Black Permanent Markers to black out personal information
- Recycle bin for plastic bottles (if pills taken out of bottles after inventory)
- Food for participants (optional but nice)
- Food for volunteers
- Tent for shade
- Chairs and Tables (2)
- Posters that describe non-acceptable substances (such as medical/business waste)
- Laptop if taking inventory (with spreadsheet software)
- Power cord for computer if taking inventory
- Trash containers for packaging and other trash
- Ziploc bags for leaky liquid medications
- Survey forms (optional)
- Clipboards for survey (optional)
- Pens/Pencils
- Instant hand cleaner/sanitizer
- Packing tape for posters
- Drinking Water
- Rubber gloves
- Display items for table
- Bathroom scale to weigh drugs for publicity purposes
- Sharps Containers (even though people are told not to bring in needles, people do! And you don't want them to just toss them in the trash on their way out.) See Sharps Disposal for instructions on where or how to obtain a sharps container.

Incentives

You may want to see if local vendors will donate food for the collection event. It is nice to provide individuals with free goodies. They will be more enthusiastic to fill out a survey or read more information on other ways they can contribute to the cause.

- Bottled waters, coffee, soft drinks
- Cookies, doughnuts, snacks
- Pizza

Note: Remember to write thank you notes and report on the success of the event the following week.

Pre-Event Checklist:

Have you....?

- ☐ Ensure that all relevant state agencies have agreed to the procedure used
 - ☐ Local law enforcement agreement
 - ☐ DEA registration approval
- ☐ Budget/funding
- ☐ Site Selection
- ☐ Arrangement with Pharmacist (optional)
- ☐ Determine traffic flow and site set-up
- ☐ Advertise/press release
- ☐ Arrange on-site volunteers/staff
- ☐ Secure equipment and supplies

DAY OF THE EVENT

The Team

Local law enforcement (at least 2)
 Supervisor/Manager
 Pharmacist (optional)
 Data Input (optional)
 Volunteer Greeter (1-2 people)
 Volunteer Traffic Director
 Informational Table/Goodies Supervisor
 Surveyor (optional)

Handling Pharmaceuticals:

To be on the safe side, only a trained professional should handle any returned substance. Have volunteers direct the public to place them directly into the bins. If a pharmacist is present, have the individual hand the collections over to the pharmacist. A law enforcement official must be present and observing if this is to take place.

Site Safety:

It is very important to make sure that public safety comes first. Take your time planning the best on-site staffing, traffic flow, security, and equipment. Make your first priority ensuring

medications are not diverted, and the safe and legal disposal occurs. Configure the site to minimize the risk of diversion, and allow the law enforcement to monitor the public from their cars to the drop off location. The risk of theft or accident is too great, and the dangers of such results far outweigh any inconvenience or expense of ensuring that all medications are collected and removed properly.

It is important to remember that these are medicines, so latex gloves should be worn by anyone handling them. Accidental ingestion should be avoided, even through skin or breathing, so make sure to separate any drinking or eating area from the collection area.

Acceptable Items

- Expired or unwanted prescription medications
- Over the counter medications
- Vitamins and Nutritional Supplements
- Veterinary Medications
- Homeopathic remedies
- EpiPens

Prescription Bottles

The public should bring the medications in their original bottles or containers.

Black-out Personal Information?

You should provide black markers for individuals to black out their information as well as their doctors information, but encourage them to not black out the medication name. This is necessary if you need to catalogue the medications.

NO Medical Waste

Take-Back programs should not accept medical waste. What is considered medical waste?

- i. Needles/Sharps (excluding EpiPens)
- ii. Thermometers
- iii. IV bags
- iv. Bloody or infectious waste
- v. Personal care products

Those running the program must regulate to make sure that there is no medical waste entering the bins.

What other substances are NOT acceptable

- vi. Hydrogen peroxide
- vii. Empty containers
- viii. Business waste (see next paragraph)
- ix. Aerosol cans

Individual Household Returns ONLY

Pharmaceuticals generated from households are exempt of the hazardous waste rules. However, businesses must evaluate their discarded pharmaceuticals to determine if they are listed

as hazardous waste. Pharmaceuticals that are either hazardous or come from a non-residential source must be managed in accordance with applicable rules and cannot be collected, managed, or disposed through a pharmaceutical collection event for residents.

Medications cannot be accepted from businesses such as nursing homes, doctor's offices or any other institution.

Weighing boxes

The law enforcement may have specific requirement for the inventory of the pharmaceuticals. But, for publicity purposes it is very effective to weigh each box of returned medications. You should record this weight in pounds and report out to the community on the success of the event.

On-site survey

An individual's time at the event is usually brief. You may find it useful to conduct a brief survey while they take time to enjoy some snacks or read about other community events. It may be helpful to know their age range, sex, how they heard about the event, interest in the program, get personal information for future advertising, questions etc...

1. How did you hear about this disposal event?
2. How did you dispose of your pharmaceuticals previously?
3. Sex, Age range
4. Etc...

Be sure to include signs or direct traffic to the information/survey/food table after they drop off medications. Clearly define the tables to create a good flow of traffic between the stations.

Educational Materials and Opportunities

Take back events not only provide a place for returns, but also a window to distribute education materials and information. You are welcome to create your own materials or take advantage of the many resources listed under the advertising section. You could consider:

- Playing proper disposal videos on a laptop
- Display drug prevention , drug rehabilitation, clean water, waste management, law enforcement and other community partners educational information

STORAGE and TRANSPORTATION

Storage before transport to disposal

The boxes will be stored in a secure location at the local police station before transferred to ISP for disposal.

Transportation

ISP takes the substances to a commercial incineration facility in Utah or Spokane, Washington. ISP makes this trip around 2 times a year.

OTHER TYPES OF PROGRAMS

Police Station Permanent Drop-Off Bins

Permanent drop off bins can only be placed in environments where there is constant law enforcement present, such as at police stations. If you are interested in starting a permanent drop-off bin, it must be discussed with your local police department. Ada County as well as Meridian and Garden City have started a pharmaceutical take-back called [Curb-it](#), with bins located in community police departments. Contact Angela Deckers, Boise City Public Works, at (208) 384-3983 for more information.

Pharmacy Take-Back Bins

Idaho State Board of Pharmacy IDAPA 27.01.01.156.05 doesn't allow the public to take drugs back to pharmacists and pharmacies in the state of Idaho. Once passed from the facility to the patient the medication is no longer eligible for return.

OTHER RESOURCES

What if I don't have a take-back program in my area?

Do not flush your medications down the toilet or drain. Proper trash disposal is the best option. Take the medications out of their containers. Pour all medications into a large Ziploc bag, you may include liquids. Then add an undesirable substance such as kitty litter, sawdust, or used coffee grounds to the mixture. You should also add a little water to help dissolve the pills. Then throw it in the trash. Conceal or remove your personal information on the empty medicine container and throw those in the trash or recycling.

[Click here to watch a short clip demonstrating the proper disposal techniques, provided by SMARxT DISPOSAL.](#)

Other Great Informational Resources

[Office on National Drug Control Policy: ONDCP on Prescription Drugs](#)
[National Institute on Drug Abuse, Prescription Drugs](#)
[Parents, The Anti-Drug](#)

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